

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

| | | |
|------------------------|---|----------------------|
| JEZIGN LICENSING, LLC, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | No. 8:16-cv-1192-TDC |
| NIKE, INC., |) | |
| |) | |
| Defendant. |) | |

**DEFENDANT NIKE, INC.'S CONSENT MOTION FOR A STAY OF ALL
PROCEEDINGS PENDING OUTCOME OF NIKE INC.'S IPR PETITION**

Defendant Nike Inc. ("Nike"), by counsel, moves this Court for an order staying all proceedings in this case pending the outcome of its *Inter Partes* Review petition. The relevant facts are as follows:

1. On August 25, 2016, the Court held a Case Management Conference during which Nike Inc. ("Nike") informed the Court of its intent to file an *Inter Partes* Review ("IPR") petition regarding U.S. Patent No. 6,837,590 ("590 patent"), the only patent asserted in this case. Nike also informed the Court that it planned to seek a stay of the instant case pending the Patent Trial and Appeal Board's ("PTAB") decision on whether to institute Nike's IPR petition.
2. Thereafter, the Court ordered the parties to meet and confer regarding a potential stay and any modifications to the case schedule in light of such a stay (Dkt. 24).
3. The parties met and conferred on August 31, 2016 and agreed that a stay pending the PTAB's institution decision on Nike's IPR petition is the most efficient way for the parties and the Court to move this matter forward.

4. Nike intends to file its IPR on or before November 11, 2016.

Therefore, Nike, without opposition from Plaintiff Jezign Licensing, LLC, moves the Court to stay the case and issue an order implementing the following procedures which have been agreed to by the Parties:

- All deadlines set forth in the Court's Scheduling Order (Dkt. 19) should be vacated and reset after the stay is lifted;
- Within 10 days of a decision by the Patent Trial and Appeal Board ("PTAB") on institution of Nike's IPR, the parties will file a joint status report with the Court apprising it of the PTAB's decision;
- If the PTAB institutes the IPR, the case will continue to be stayed until the PTAB renders its final written decision on the IPR and all appeals have been exhausted; and,
- If the PTAB does not institute the IPR, the case will resume promptly thereafter, starting with service of Jezign's infringement contentions.

DATED: September 1, 2016

Respectfully submitted,

ATTORNEYS FOR NIKE, INC.

/s/

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Elaine Zhong, *pro hac vice*

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